

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
JESSICA DAVIDSON, ESQ.**

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co. (“ZHP”), Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC (collectively, the “ZHP Defendants”). I make this Certification based on personal knowledge and in support of the ZHP Defendants’ Memorandum of Law in Support of Motion to Seal.

2. Attached hereto as Exhibit 1 is a redacted version of a true and accurate copy of Exhibit 2 to Plaintiffs’ Brief in Support of *Daubert* Motion to Preclude Opinions of Defense Expert Fengtian Xue, Ph.D. (ECF No. 2288-3), an unredacted copy of which was previously submitted to the Court *in camera*.

3. Attached hereto as Exhibit 2 is a true and accurate copy of the Certification of Christopher Cox, dated July 20, 2023.

4. Attached hereto as Exhibit 3 is a true and accurate copy of the Declaration of Jucai Ge in Support of the ZHP Defendants' Motion to Seal, dated July 20, 2023.

5. Attached hereto as Exhibit 4 is a true and accurate copy of the Confidentiality Order signed by Dr. Fengtian Xue on November 20, 2022.

Respectfully submitted,

/s/ Jessica Davidson

Jessica Davidson (DC Bar No. 457021)
(Admitted to Practice in Maryland and the
District of Columbia; Not Admitted in New
York)

*Liaison Counsel for Manufacturer
Defendants*

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Dated: July 20, 2023